

Appl. No. 10/028,014  
Amdt. Dated 12/24/2003  
Reply to Office Action of 09/24/03

### **REMARKS/ARGUMENTS**

This Amendment is in response to the Office Action mailed 09/24/03. In the Office Action, the Examiner objected to the drawings and the specification and rejected (i) claims 1-7 and 8-12 under 35 U.S.C. § 112, and (ii) claims 1-5, 8-10 and 12-15 under 35 U.S.C. § 103. Reconsideration in light of the amendments and remarks made herein is respectfully requested.

In the specification, the paragraphs [0008], [0029] and [0030] have been amended to correct minor editorial problems. In amended Figures 1, 3-5 and 7-8, the previously omitted reference signs mentioned in the description have been added.

Claims 1-15 remain in this application.

#### ***Claim Objections***

The Examiner objects to the claims 1 and 13. Applicant has amended claims 1 and 13 to correct minor formalities. Applicant respectfully requests that the Examiner withdraw the objections to claims 1 and 13.

#### ***Specification***

1. The Examiner objects to the specification

Applicant respectfully requests that the Examiner withdraw the objection to the specification.

#### ***Rejection Under 35 U.S.C. § 112***

1. The Examiner rejects claims 1-7 and 8-12 under 35 U.S.C. § 112, second paragraph, as being allegedly indefinite. Applicant has amended claims 1 and 8 to correct minor informalities and respectfully requests that the Examiner withdraw the rejection of claims 1-7 and 8-12 under 35 U.S.C. § 112, second paragraph.

#### ***Rejection Under 35 U.S.C. § 103***

1. Claims 1-5, 8-10 and 12-15 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Robertson et al. (U.S. Patent 5,670,984) ("Robertson") in view of Piazza et al. (U.S. Patent 6,191,793 B1) ("Piazza"). Applicant respectfully traverses the rejection and contend that the Examiner has not met the burden of establishing a *prima facie* case of obviousness.

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Robertson discloses image lens. A viewpoint may move with the lens or move differently depending on where the lens panel is and how it is moved (Robertson, col. 9, lines 1-2; lines 8-10).

Piazza discloses a method and apparatus for texture level of detail dithering. An apparent distance is computed by comparing the size of the pixel to the size of the texture cells or texels (Robertson, col. 4, lines 37-41).

Robertson and Piazza do not disclose, suggest, or render obvious retaining eye point  $\delta$  angle data, perturbing each eye point  $\delta$  angle, and incorporating perturbed texel angles. The Examiner states that the eye point angle is interpreted to be substantially similar to the angle formed by the coordinates of the viewpoint versus the dimensions of the image lens. Applicant respectfully disagrees. The eye point  $\delta$  angle is the angle formed from the viewpoint and the local surface normal (See Specification, page 5, paragraph [0020]; Figures 4 and 5). Piazza does not disclose or suggest perturbing texel angles having U and V coordinates. However, to clarify the claim language, Applicant has amended claims 1, 8 and 13.

The Examiner also rejected claims 6, 7 and 11 under 35 USC 103(a) as being unpatentable over Robertson and Piazza, and further in view of Rossignac (U.S. Patent 5,872,572) ("Rossignac").

Rossignac discloses a method and apparatus for generating non-uniform resolution image data. A rendering engine organizes the view into portions corresponding to co-centric fields of view (Rossignac, col. 5, lines 21-22). The viewing frustum is bounded by 4 planes that intersect the view point (Rossignac, col. 5, lines 25-27). Two of three planes are vertical and oriented by an angle  $\alpha$  with respect to one another. Two other are horizontal and are oriented by angle  $\beta$  with respect to one another (Rossignac, col. 5, lines 25-31).

Contrary to the Examiner's contention, the two angles  $\alpha$  and  $\beta$  are angles formed by the planes with respect to one another, not resolved into the X-Z or Y-Z planes. Furthermore, none of Robertson, Piazza and Rossignac discloses an eye point  $\delta$  angle.

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. MPEP §2143, p. 2100-124 (8<sup>th</sup> Ed., rev. 1, Feb. 2003). Applicants respectfully contend that there is no rejection or motivation to combine their teachings. However, no *prima facie* case of obviousness has been established.

Applicant respectfully requests that the Examiner withdraw the rejection of claims 1-5, 6 -10 and 11-15 under 35 U.S.C. § 103(a).

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***Conclusion***

Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

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**Attachments**

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